

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

ROOSEVELT ROAD RE, LTD.; TRADESMAN
PROGRAM MANAGERS, LLC; and IONIAN RE, LLC

Plaintiffs,

v.

LIAKAS LAW, P.C.; DEAN N. LIAKAS; JOHN DOE
NOS. 1-25; XYZ CORPORATION NOS. 1-25;
BROOKLYN MEDICAL PRACTICE, P.C.; SAYEEDUS
S. SALEHIN, M.D.; ADVANCED ORTHOPEDICS
AND JOINT PRESERVATION P.C.; STAN
AVSHALUMOV, D.O.; COMMUNITY MEDICAL
IMAGING OF BROOKLYN P.C.; ANDREW J.
MCDONNELL, M.D.; ORTHOPAEDICS SPINE &
SPORTS MEDICINE, LLC, s/d/b/a TOTAL
ORTHOPAEDICS & SPORTS MEDICINE; VADIM
LERMAN, D.O.; ABHISHEK KUMAR, M.D.;
SHIVEINDRA JEYAMOHAN, M.D.; BIG APPLE PAIN
MANAGEMENT, P.L.L.C.; RICHARD APPLE, M.D.;
NORTH SHORE FAMILY CHIROPRACTIC, P.C.;
TODD LAWRENCE LEBSON, D.C.; UNICORN
ACUPUNCTURE, P.C.; DEKUN WANG, L.Ac;
ENGLINTON MEDICAL, P.C.; SHIARREE
EVARISTO, P.T.; ARKADIY SHUSTERMAN, D.O.;
COUNTER POINT MEDICAL, P.C.; UPWARD
MEDICAL, P.C.; MARK KOSTIN, M.D.; BROOKLYN
PREMIER ORTHOPEDICS AND PAIN
MANAGEMENT P.L.L.C.; FJ ORTHOPAEDICS AND
PAIN MANAGEMENT P.L.L.C.; VAGMIN VORA,
M.D.; JONATHAN SIMHAE, M.D.; STEVEN
HOROWITZ, M.D.; BL PAIN MANAGEMENT,
P.L.L.C. d/b/a PAIN MANAGEMENT NYC; PAIN
PHYSICIANS NY, P.L.L.C.; BOLES LAV
KOSHARSKYY, M.D.; ROMAN SHULKIN, M.D.;
LEONID REYFMAN, M.D.; MCCULLOCH
ORTHOPAEDIC SURGICAL SERVICES, P.L.L.C.
s/d/b/a NEW YORK SPORTS AND JOINTS
ORTHOPAEDIC SPECIALISTS; KENNETH
McCULLOCH-OTERO, M.D.; DAVID R. CAPIOLA,
M.D.; GOTHAM NEUROSURGERY, P.L.L.C.;
ANDERS COHEN, D.O.; GARDEN STATE
ORTHOCARE LLC, d/b/a ORTHOCARE SURGICAL;
RANDALL EHRLICH, M.D.; PRECISION PAIN
MANAGEMENT, P.C.; and ARI BENJAMIN LERNER
M.D.,

Defendants.

Case No. 1:25-cv-00300-ENV-RML

DECLARATION OF SERVICE

JAMES M. CATTERSON declares the following to be true and correct under penalty of perjury under the laws of the United States of America:

1. I am a member of the Bar of this Court and a partner at Pillsbury Winthrop Shaw Pittman LLP, attorneys for Defendants Liakas Law, P.C., and Dean N. Liakas (hereinafter referred to as “Liakas Law”) in this action.

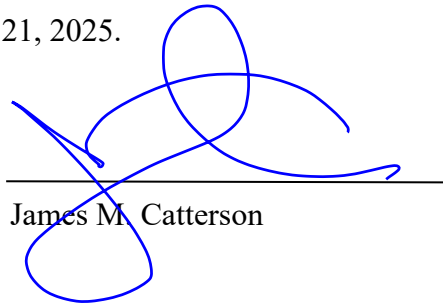
2. On April 17, 2025, I caused to be served a copy of Liakas Law’s Letter Motion requesting a Pre-Motion Conference (Dkt. No. 82) via overnight FedEx on the following individuals and/or entities:

- a. Abhishek Kumar, M.D. at 1789 Sheepshead Bay Rd, Brooklyn, New York 11235
- b. Ari Benjamin Lerner, M.D. at 25-15 Crescent St, Astoria, New York 11102
- c. BL Pain Management, P.L.L.C. d/b/a Pain Management NYC at 95-27 Jamaica Ave, Woodhaven, New York 11421
- d. Boleslav Kosharsky, M.D. at 95-27 Jamaica Ave, Woodhaven, New York 11421
- e. Leonid Reyfman, M.D. at 95-27 Jamaica Ave, Woodhaven, New York 11421
- f. LR Medical, P.L.L.C. at 2279 Coney Island Ave, Ste 200, Brooklyn, New York 11223
- g. Pain Physicians NY, P.L.L.C at 2279 Coney Island Ave, Ste 200, Brooklyn, NY 11223
- h. Precision Pain Management, P.C. at 161-10 Jamaica Ave, Ste 301, Jamaica, New York 11432
- i. Roman Shulkin, M.D. at 95-27 Jamaica Ave, Woodhaven, New York 11421
- j. Shiveindra Jeyamohan, M.D. at 1789 Sheepshead Bay Rd, Brooklyn, New York 11235
- k. Vadim Lerman, D.O. at 1789 Sheepshead Bay Rd, Brooklyn, New York 11235

3. Attached hereto as **Exhibit A** are true and correct copies of the FedEx delivery confirmations, demonstrating that the FedEx packages were delivered to Abhishek Kumar, M.D., Ari Benjamin Lerner, M.D., BL Pain Management, P.L.L.C. d/b/a Pain Management NYC, Boleslav Kosharsky, M.D., Leonid Reyfman, M.D., Precision Pain Management, P.C., Roman Shulkin, M.D., Shiveindra Jeyamohan, M.D., and Vadim Lerman, D.O. on April 18, 2025.

4. Attached hereto as **Exhibit B** are true and correct copies of the FedEx delivery confirmations, demonstrating that the FedEx packages were delivered to LR Medical, P.L.L.C., and Pain Physicians NY, P.L.L.C., on April 21, 2025.

Executed in New York, New York on April 21, 2025.



James M. Catterson